

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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Vanky Bernadeau, as next friend and guardian of C.B., a minor,

Plaintiff,

-against-

THE CITY OF NEW YORK, ET AL.,

Defendants.

**DEFENDANT CITY'S  
ANSWER TO DEFENDANTS  
MAYFIELD AND MENESSES'  
CROSS-CLAIMS AGAINST  
DEFENDANT CITY OF NEW  
YORK**

25-CV-483 (NRM) (VMS)

**JURY TRIAL DEMANDED**

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Defendant City of New York ("City"), by its attorney, Muriel Good-Trufant, Corporation Counsel of the City of New York, as and for its Answer to the cross-claims asserted against it by defendants Tanisha Mayfield and Sergio Meneses in their Answer to the Amended Complaint with Cross-Claims against the City of New York ("defendants Mayfield and Meneses' Answer"),<sup>1</sup> respectfully alleges, upon information and belief, as follows:

**"AS FOR A FIRST CROSS-CLAIM AGAINST DEFENDANT  
THE CITY OF NEW YORK"**

112. Denies the allegations set forth in paragraph "112" of defendants Mayfield and Meneses' Answer; to the extent the allegations in this paragraph contain conclusions of law, no response is required.

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<sup>1</sup> See Dkt. No. 21, Answer, July 3, 2025

**"AS FOR A SECOND CROSS-CLAIM AGAINST DEFENDANT  
THE CITY OF NEW YORK"**

113. States that the allegations set forth in paragraph "113" of defendants Mayfield and Meneses' Answer are conclusion of law to which no response is required.

114. States that the allegations set forth in paragraph "114" of defendants Mayfield and Meneses' Answer are conclusion of law to which no response is required.

**"AS FOR A THIRD CROSS-CLAIM AGAINST DEFENDANT  
THE CITY OF NEW YORK"**

115. Denies the allegations set forth in paragraph "115" of defendants Mayfield and Meneses' Answer; to the extent the allegations in this paragraph contain conclusions of law, no response is required.

116. States that the allegations set forth in paragraph "116" of defendants Mayfield and Meneses' Answer are conclusion of law to which no response is required.

117. Denies the allegations set forth in paragraph "117" of defendants Mayfield and Meneses' Answer; to the extent the allegations in this paragraph contain conclusions of law, no response is required.

**"AS FOR A FOURTH CROSS-CLAIM AGAINST DEFENDANT  
THE CITY OF NEW YORK"**

118. Denies the allegations set forth in paragraph "118" of defendants Mayfield and Meneses' Answer; to the extent the allegations in this paragraph contain conclusions of law, no response is required.

**FIRST DEFENSE/AFFIRMATIVE DEFENSE:**

119. Defendants Mayfield and Meneses' cross-claims against defendant City of New York fail, in whole or in part, to state a claim upon which relief can be granted.

**SECOND DEFENSE/AFFIRMATIVE DEFENSE:**

120. Any injury alleged to have been sustained resulted from defendants Mayfield and/or Meneses' own culpable or negligent conduct and/or the intervening conduct of third parties and was not the proximate result of any act of defendant City of New York.

**THIRD DEFENSE/AFFIRMATIVE DEFENSE:**

121. Defendants Mayfield and Meneses' cross-claims may be barred in whole or in part, for failure to comply with New York General Municipal Law § 50-e through § 50-k, *et seq.*

**FOURTH DEFENSE/AFFIRMATIVE DEFENSE:**

122. Defendants Mayfield and/or Meneses may not have acted in furtherance of their employment.

**FIFTH DEFENSE/AFFIRMATIVE DEFENSE:**

123. This Court lacks jurisdiction over defendants Mayfield and Meneses' cross-claims.

**SIXTH DEFENSE/AFFIRMATIVE DEFENSE:**

124. Defendants Mayfield and/or Meneses may have acted in violation of the rules and regulations of the New York City Police Department and the City of New York at the time of the incident giving rise to the instant case.

**WHEREFORE**, defendant City of New York requests judgment dismissing all cross-claims brought by defendants Tanisha Mayfield and Sergio Meneses against it, in their entirety, together with the costs and disbursements of this action, and such other and further relief as the Court may deem just and proper.

Dated:           New York, New York  
                 July 10, 2025

MURIEL GOODE-TRUFANT  
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By:     */s/ Gregory J.O. Accarino*  
Gregory J.O. Accarino  
*Senior Counsel*  
Special Federal Litigation Division

cc:     **By ECF**  
Gideon Oliver  
Remy Green  
*Attorneys for Plaintiff*

Doug LaBarbera  
*Attorney for Defendants Mayfield and Meneses*